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*Attorneys for Defendant,
Counterclaimant, Third-Party Plaintiff,
and Counterdefendant
Indian Harbor Insurance Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA GARNICA, an individual,

Plaintiff,

v.

INDIAN HARBOR INSURANCE COMPANY;
DOES I - V, and ROE CORPORATIONS I - V,
inclusive,

Defendants.

INDIAN HARBOR INSURANCE COMPANY,

Counterclaimant,

v.

MARIA GARNICA,

Counterdefendant.

CASE NO.: 2:21-cv-00560-JCM-VCF

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO ALLOW THIRD-PARTY
DEFENDANT AND THIRD-PARTY
COUNTERCLAIMANT LOUI DEEDS
TO WITHDRAW REPLY IN
SUPPORT OF MOTION TO
COMPEL [ECF 104] AND RE-FILE
REPLY IN COMPLIANCE WITH
LOCAL RULE 7-3(b)**

(FIRST REQUEST)

INDIAN HARBOR INSURANCE COMPANY,

Third-Party Plaintiff,

v.

LOUI DEEDS, an individual, NELLY IRAN, an individual, BLUE SHIELD OF CALIFORNIA, a California corporation,

Third Party Defendants.

LOUI DEEDS, an Individual,

Third-Party Defendant's Counterclaim,

v.

INDIAN HARBOR INSURANCE COMPANY;
DOES I-V, and ROE CORPORATIONS I-V,
inclusive

Counterdefendants.

COMES NOW, defendant, counterclaimant, third-party plaintiff, and counterdefendant INDIAN HARBOR INSURANCE COMPANY ("Indian Harbor"), by and through its counsel of record, and counterdefendant and counterclaimant LOUI DEEDS ("Deeds"), by and through her counsel of record, to hereby submit this Stipulation and [Proposed] Order and agree as follows:

On July 28, 2023, Deeds filed her Reply in Support of Motion to Compel. (ECF No. 104). The Reply was in excess of the page limit requirement prescribed by LR 7-3(b). Counsel for the parties met and conferred on August 8, 2023, and agreed to allow Deeds to withdraw the Reply [ECF 104] and re-file a version of the Reply that comports with the page limit requirement of LR 7-3(b). The parties agree that Deeds will have until Friday, August 18, 2023 to file said Reply. Indian Harbor agrees and stipulates that the re-filed pleading should not be considered untimely, and that Indian Harbor will not present any arguments to the Court at the September 6, 2023, hearing regarding the timeliness of Deed's re-filed Reply.

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The parties also agree and stipulate that the additional time for Deeds to re-file the Reply is necessary and appropriate as the parties are continuing to meet and confer over certain aspects of discovery addressed in the Motion to Compel [ECF 94], in the hopes that they can narrow the issues that must ultimately be decided by the Court.

SHOOK & STONE, CHTD

CLYDE & CO US LLP

/s/ Kurt D. Anderson

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Third-Party Counterclaimant Loui Deeds*

/s/ Dylan Todd

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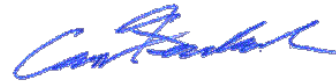
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*Attorneys for Defendant, Counterclaimant,
Third-Party Plaintiff, and Counterdefendant
Indian Harbor Insurance Company*

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 8-11-2023

Brouse, Gina

From: Lipsitz, Sam
Sent: Thursday, August 10, 2023 2:23 PM
To: Brouse, Gina
Cc: Todd, Dylan; Celebrezze, Bruce
Subject: FW: Stipulation regarding Reply and Discovery Issues [CC-US2.05289.10164655/007.FID861865]
Attachments: Garnica - DRAFT Stipulation to Withdraw Reply and Re-File.docx; Garnica - DRAFT Stipulation to Withdraw Reply and Re-File.docx.nrl
Categories: Do Today

Hi Gina:

Based on the approval below, can you please finalize and file the attached? Please let me know if you have any questions.

Thank you,

Sam Lipsitz
Senior Associate | Clyde & Co US LLP
Direct Dial: +1 415 365 9813 | **Mobile:** +1 314 852 7654

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From: Kurt Anderson <KAnderson@shookandstone.com>
Sent: Thursday, August 10, 2023 12:50 PM
To: Lipsitz, Sam <Sam.Lipsitz@clydeco.us>; Todd, Dylan <Dylan.Todd@clydeco.us>
Cc: Leonard Stone <lstone@shookandstone.com>; Sara Hill <SHill@shookandstone.com>
Subject: RE: Stipulation regarding Reply and Discovery Issues [CC-US2.05289.10164655/007.FID861864]

Sam and Dylan,

Thank you for preparing this stipulation. It comports with our agreement.

You may affix my signature.

Kurt Anderson



Kurt Anderson | Attorney

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